

From: Sarah A. Zylstra
Sent: Wednesday, January 5, 2022 9:54 AM
To: Covaleski, Paul
Cc: Ingrisano, Jonathan; Wittenwyler, Mike; Noel Sterett; Evan Tenebruso; Tanner G. Jean-Louis; Kimberly Crowell
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Paul,

I agree on rescheduling. We are available Tuesday afternoon or Wednesday morning.



SARAH A. ZYLSTRA
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Wednesday, January 5, 2022 8:26 AM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Good Morning Sarah,

Jonathan has also unfortunately come down with something and will not be able to attend this afternoon – we were going to trudge forward without him on the call, but I think given your email it probably just makes sense to reschedule. Do you agree?

If so, we can agree to moving the meet and confer to a mutually agreeable time Tuesday or Wednesday of next week, which will have given you a full week to speak with your clients since receiving our letter. Does that work for your team?

Finally, I know I scheduled this for an hour, but I'm thinking we will probably need 90 minutes - if we are rescheduling anyways I think it also makes sense to change the length of the meet and confer. Please let me know if you disagree.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Wednesday, January 5, 2022 7:58 AM
To: Covaleski, Paul <PCovaleski@gklaw.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Paul,

Just to be clear, I had expected to receive this letter back in December when we discussed setting this meet and confer call. Given the lateness of receipt of this letter in relation to our call this afternoon, I will not have had a chance to confer with the necessary City personnel on these items before our call. I am still fine with proceeding with our call but I will not have answers on many items.

Sarah



SARAH A. ZYLSTRA
ATTORNEY
DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Tuesday, January 4, 2022 10:59 AM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Sarah,

I hope you had a nice holiday season. Please find attached Edgewood's letter regarding Defendants' discovery responses and objections in anticipation of tomorrow's meet and confer. We look forward to discussing these issues with you more at that time.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Sarah A. Zylstra <szylstra@boardmanclark.com>

Sent: Thursday, December 16, 2021 1:56 PM

To: Covaleski, Paul <PCovaleski@gklaw.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>

Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Please include Evan and Tanner on the service list going forward. For the invite, it will be me and Tanner on the call. Thanks.



SARAH A. ZYLSTRA
ATTORNEY

DIRECT +1 608-283-1741

PHONE 608-257-9521

FAX 608-283-1709

SZYLSTRA@BOARDMANCLARK.COM

BOARDMANCLARK.COM

BOARDMAN & CLARK LLP

1 SOUTH PINCKNEY ST STE 410

PO BOX 927

MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>

Sent: Thursday, December 16, 2021 1:14 PM

To: Sarah A. Zylstra <szylstra@boardmanclark.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>

Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Thanks Sarah. Let's plan on 2:00 on the 5th. I'll send an invite – I've noticed a few new names on the email thread, should I send the invite to everyone? Also should we update our service list to reflect the folks on your team on this thread?

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Thursday, December 16, 2021 9:00 AM
To: Covaleski, Paul <PCovaleski@gklaw.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

We are free after 1:30 on the 5th.



SARAH A. ZYLSTRA
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Tuesday, December 14, 2021 12:01 PM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Sarah,

We are alright kicking back the meet and confer given the challenges posed by the holidays. How do the 4th or 5th of January work for you and your team? We are free starting at about 10:30 on the 4th and free all day the 5th.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Tuesday, December 14, 2021 10:38 AM
To: Covaleski, Paul <PCovaleski@gklaw.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>

<TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Paul,

While I anticipate potentially being in the office one of those days, I anticipate that after I receive your letter, I may want to schedule a call with my client to discuss it before our meet and confer and I do not believe I will be able to get everyone at the City during that time. I think it might be safer to schedule after January 1.



SARAH A. ZYLSTRA
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Tuesday, December 14, 2021 10:19 AM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltontomich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Hello Sarah,

Thanks for getting these over to us last week. We have done an initial review of Defendants' responses, and as anticipated we would like to have a meet and confer regarding them.

Before our meet and confer we will send a letter outlining the specific responses we would like to discuss, as well as our positions on those responses – hopefully that will help structure our discussion.

In the interim, and given the holiday season, we wanted to proactively reach out and try and get something on the schedule. Are you going to be in the office and available on December 28-30? If so, our team has a fair degree of flexibility over that time and we are happy to work with you to find a good time.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.

From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Thursday, December 9, 2021 1:53 PM
To: Covaleski, Paul <PCovaleski@gklaw.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>; Evan Tenebruso <ETenebruso@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>; Kimberly Crowell <KCrowell@boardmanclark.com>
Subject: RE: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Paul,

Attached are the City Defendants' responses to Edgewood's discovery. Later today my paralegal Kim will send along the production. As we discussed this will be a rolling production and there is a fair amount more I expect to produce. Thank you.



SARAH A. ZYLSTRA
ATTORNEY

DIRECT +1 608-283-1741
PHONE 608-257-9521
FAX 608-283-1709
SZYLSTRA@BOARDMANCLARK.COM
BOARDMANCLARK.COM

BOARDMAN & CLARK LLP
1 SOUTH PINCKNEY ST STE 410
PO BOX 927
MADISON, WI 53701-0927

From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Tuesday, November 2, 2021 3:31 PM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>; Noel Sterett <nsterett@daltonmich.com>
Subject: Edgewood v. City of Madison et al., 21-CV-118 - Edgewood's Discovery Requests [GK-Active.FID3018047]

Hello Sarah,

Please find attached Plaintiff Edgewood High School's requests for production, requests for admission, and interrogatories in the above captioned matter.

Please let us know if you have any questions.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct
PCovaleski@gklaw.com

GODFREY KAHN SC
One East Main Street, Suite 500 | Madison, Wisconsin 53703-3300



This is a transmission from the law firm of Godfrey & Kahn, S.C. and may contain information which is privileged, confidential, and protected by the attorney-client or attorney work product privileges. If you are not the addressee, note that any disclosure, copying, distribution, or use of the contents of this message is prohibited. If you have received this transmission in error, please destroy it and notify us immediately at (414) 273-3500.